

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JAMES A. WILSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 05-399-JJF
	)	
STANLEY TAYLOR, et al.,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF MELVIN HENNESSY**

I, Melvin Hennessy, having been duly sworn according to the law, do hereby  
depose and state the following:

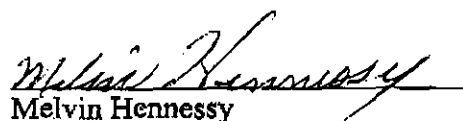
1. I am employed by the State of Delaware, Department of Correction at the Sussex Correctional Center ("SCI"), in Georgetown, Delaware as Security Superintendent. I have been employed by the Department of Correction for 23 years. My duties include acting as disciplinary hearing officer. I have held this position since 2000.
2. In response to a request from the State of Delaware Department of Justice, I have reviewed information regarding James Wilson and his job and housing during 2005, at SCI.
3. Between the dates of November 14, 2004 and April 4, 2006 inmate James Wilson was employed as an education assistant.
4. An education assistant works in the Annex building.
5. The job requirements for an education assistant are a G.E.D., ability to get along with others, organizational skills, and ability to follow directions.
6. The job of education assistant is considered one of the "better" jobs for inmates at SCI.
7. Those people who are not literate, or who are unskilled do not qualify for this job.



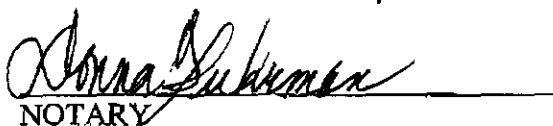
8. Between the dates of October 16, 2004 and April 1, 2006, inmate James Wilson was housed in the Merit building.

9. The Merit building is an honor building, and an inmate must be in a program and working in order to stay in this building. The inmate must also be free of disciplinary write-ups.

10. I have made these statements based upon my personal knowledge, specialized training, and experience as an employee of the Department of Correction.

  
Melvin Hennessy

SWORN TO AND SUBSCRIBED BEFORE ME THIS 1st DAY OF June 2006.

  
NOTARY

DONNA FUHRMAN  
NOTARY PUBLIC, STATE OF DELAWARE  
My Commission Expires September 4, 2007

